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10	UNITED STATES DISTRICT COURT			
11	NORTHERN DISTRICT OF CALIFORNIA			
12		`		
13	ABHINAV BHATNAGAR,) Case No.: Case No. CV-07-02669 (CRB)		
14	Plaintiff,)) DECLARATION OF JENNY HUANG		
15	VS.) IN SUPPORT OF PLAINTIFF'S) OPPOSITION TO MOTION TO STRIKE		
16	JASON INGRASSIA, individually and in) REPLY BRIEF		
17	his official capacity; COUNTY OF)) Date: August 26, 2008		
18	CONTRA COSTA; and CITY OF SAN RAMON.) Time: 9:30 am		
19		Honorable Elizabeth D. Laporte		
20	Defendants.))		
21		,		
22				
23	I, JENNY HUANG, state under penalty of perjury as follows:			
24	1. I am counsel for Plaintiff Abhinav Bhatnagar in the above-referenced action. I			
25	submit this declaration in support of Mr. Bhatnagar's Opposition to Defendant Ingrassia's			
26	Motion to Strike Plaintiff's Reply Brief in Support of Plaintiff's Motion to Compel Discovery			
27				
28	from Defendant Ingrassia.			

Huang Declaration in Support of Plaintiff's Opposition to Motion to Strike Reply Brief Page 1 of 2 $\,$

- 2. On August 15, 2008, I filed Plaintiff's Reply Brief in Support of Plaintiff's Motion to Compel Discovery from Defendant Ingrassia. At the time of filing, I inadvertently and regrettably overlooked the court's order dated August 4, 2008, which required that the reply brief be filed by noon on August 15, 2008. Rather, I incorrectly assumed that the reply brief was due on August 15, 2008 and could therefore be electronically and timely filed by 11:59 p.m.
- 3. It was not until Defendant Ingrassia's Motion to Strike Plaintiff's Reply Brief was filed on August 18, 2008 that I realized the reply brief I filed on August 15, 2008 was untimely.
- 4. I assure the court and all counsel that I will pay close attention to any time limitations on future filing deadlines and will take extra precautions to ensure that all future filings are made in a timely manner.
- 5. All evidence submitted in support of Plaintiff's Reply Brief was in rebuttal to Defendant Ingrassia's Opposition Brief and did not include any newly submitted evidence.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 18, 2008 in Oakland, California.

	s/ Jenny	y Huang	
JENNY HUANG			